

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA

VERSUS

JOHN G. BERTRAND

* CRIMINAL NO.
* 18 U.S.C. § 2252A(a)(2)(A)
* 18 U.S.C. § 2252A(a)(5)(B)
*
* 6:17-CR-00262
* Judge Drell
Magistrate Judge Whitehurst

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

**RECEIPT OF CHILD PORNOGRAPHY
[18 U.S.C. § 2252A(a)(2)(A)]**

On or about February 6, 2014, within the Western District of Louisiana, the defendant, JOHN G. BERTRAND, knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of 18 U.S.C. § 2252A(a)(2) and (b). [18 U.S.C. §§ 2252A(a)(2)(A) and (b)].

COUNT 2

**RECEIPT OF CHILD PORNOGRAPHY
[18 U.S.C. § 2252A(a)(2)(A)]**

On or about March 13, 2016, within the Western District of Louisiana, the defendant, JOHN G. BERTRAND, knowingly received child pornography, as defined

in Title 18, United States Code, Section 2256(8)(A), that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of 18 U.S.C. § 2252A(a)(2) and (b). [18 U.S.C. §§ 2252A(a)(2)(A) and (b)].

COUNT 3

**RECEIPT OF CHILD PORNOGRAPHY
[18 U.S.C. § 2252A(a)(2)(A)]**

On or about June 28, 2016, within the Western District of Louisiana, the defendant, JOHN G. BERTRAND, knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of 18 U.S.C. § 2252A(a)(2) and (b). [18 U.S.C. §§ 2252A(a)(2)(A) and (b)].

COUNT 4

**POSSESSION OF CHILD PORNOGRAPHY
[18 U.S.C. § 2252A(a)(5)(B)]**

On or about December 15, 2016, in the Western District of Louisiana, the defendant, JOHN G. BERTRAND, did knowingly possess material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, and which had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer; all in violation of Title 18 United States Code Section 2252A(a)(5)(B). [18 U.S.C. § 2252A(a)(5)(B)].

NOTICE OF FORFEITURE

1. The allegations contained in Counts 1 through 4 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A, the defendant, JOHN G. BERTRAND, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense[s]; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense[s].

The property to be forfeited includes, but is not limited to, the following:

1. Apple MacBook Pro Serial Number: W80062Y68YA;
2. Western Digital 1 TB Hard Drive Serial Number: WCATR3005033;
3. Western Digital 80 GB Hard Drive Serial Number: WMAHL1247097;
4. Hitachi 60 GB Hard Drive Serial Number: 43G21GEC;
5. Western Digital External Hard Drive Serial Number: WXE908KNA436;
6. Western Digital External Hard Drive Serial Number: WXCOC A933173; and

7. Western Digital My Passport Drive Serial Number:
WX31AC43487R.

3. If any of the property described above, as a result of any act or omission
of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be
divided without difficulty,

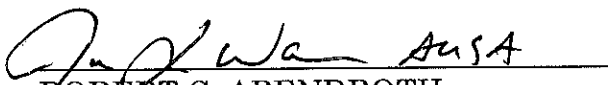
the United States of America shall be entitled to forfeiture of substitute property
pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,
United States Code, Section 2253(b) and by Title 28, United States Code, Section
2461(c).

A TRUE BILL:

REDACTED

GRAND JURY FOREPERSON

ALEXANDER C. VAN HOOK
Acting United States Attorney


ROBERT C. ABENDROTH
La. Bar No. 32311
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, LA 70501
Telephone: (337) 262-6618